



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUL 31 2014

Mr. Steven C. Nasan
Director, Residential Real Estate
Harvard Real Estate Services
Holyoke Center
1350 Massachusetts Avenue
Cambridge, Massachusetts 02138

Re: PCB Remediation Plan Modification No. 10
Peabody Terrace Housing Complex, Cambridge, Massachusetts

Dear Mr. Nasan:

This is in response to the July 23, 2014 request by the President and Fellows of Harvard College ("Harvard") to modify the PCB cleanup plan for the Peabody Terrace Housing Complex ("Peabody Complex") located at 900 Memorial Drive, Cambridge, Massachusetts ("the Site"). The modification was submitted by Harvard in accordance with Condition 17 of the *August 15, 2010 Risk-Based Cleanup and Disposal Approval under 40 CFR § 761.61(c) and § 761.79(h)* for the Peabody Complex ("Approval"). Supplemental information was provided on July 29, 2014.

PCBs at greater than (" $>$ ") 1 part per million ("ppm") have been identified in native soils located beneath the existing surface groundcovers in Play Area 1 and Play Area 2 located adjacent to Building D in the Peabody Complex. Harvard is proposing the modification in order to incorporate cleanup of the PCB-contaminated soils located beneath the rubberized mat surface and/or asphalt in the play areas under its cleanup plan and the Approval. Specifically:

1. *PCB remediation waste* (i.e., native soil, surface play sand, and sub-base/fill) with > 1 ppm but less than (" $<$ ") 50 ppm will be removed and disposed of in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(ii);
2. Samples will be collected from the hardscape groundcovers (i.e., a minimum of 2 samples of asphalt and 2 samples of rubber mat) to confirm PCB concentrations are < 1 ppm; and,
3. Soil verification samples will be collected within the play areas in accordance with a modified Subpart O sampling plan (i.e., 10-foot x 10-foot sampling grid) to confirm that the PCB cleanup standard of less than or equal to (" \leq ") 1 ppm has been met.

EPA is approving Harvard's modification request. EPA has determined that the data are adequate to support the proposed modification, that the verification sampling will be sufficient to confirm that the PCB cleanup standard has been met, and that the proposed work will not pose an unreasonable risk of injury to health or the environment. Please be advised that unless otherwise modified by this letter, all conditions specified in the Approval apply to this modification.

Questions and correspondence should be directed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval, including the Completion Report required under Attachment 1, Condition 21 to document completion of the soil cleanup in the play areas. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, this modification, and the Approval.

Sincerely,

A handwritten signature in blue ink, appearing to read "James T. Owens", with a stylized flourish at the end.

James T. Owens, Director
Office of Site Remediation & Restoration

cc: J. Hamel, Woodard & Curran
MassDEP RTN: 3-28873
File